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Extension granted

June 27, 2025

Colleen McMahon
6/27/25

Hon. Colleen McMahon
United States District Judge
United States District Court Southern District
500 Pearl Street, Room 24A
New York, New York 10007

Re: Kendra Corbin V. Triborough Bridge and Tunnel Authority, et al.
Docket No. 24-01613

Dear Judge McMahon:

This office represents Defendant Robert Ramos in the above-referenced action. We write jointly with Co-Defendants TBTA, MTA, and NYCTA and the Plaintiff to request an extension of the deadline for submitting the Joint Pre-Trial Order in this matter as follows:

Deadline for filing a joint pre-trial order extended forty five (45) days from the current date of August 5, 2025 to September 19, 2025.

The reasons for this request are several. The parties can report to the Court that since our last request for an extension of discovery, expert reports have been exchanged and the Plaintiff's expert was deposed. Additionally, an additional fact witness from the MTA Inspector Generals Office was deposed by the Plaintiff. The Plaintiff's motion to amend her complaint was granted and the Defendants have interposed answers. As such, all discovery has been completed.

While the parties have been working diligently to complete discovery, we have also been engaging in good faith efforts to resolve this matter through settlement with the assistance of Magistrate Judge Sarah Cave. To that end, we met with the Magistrate on April 24, 2025, again on May 22, 2025 and most recently on June 24, 2025. Notwithstanding our good faith efforts, we were unable to reach a resolution. However, the parties expressed a desire to continue our efforts and Judge Cave has set a date of July 18, 2025 to make another attempt at settlement.

The current date for submission of the Joint Pre-trial Order is August 5, 2025. In the event that the parties cannot reach a settlement on July 18, 2025, it will be necessary for the parties to confer and coordinate our respective schedules to be incorporated into the JPTO. Additionally, should any party seek to move for summary judgment, it will be necessary to discuss whether we can reach an agreement on undisputed facts in order to streamline the submission of our respective Rule 56 statements. Lastly, as per the Courts individual part rules, proposed *voir dire*, requests to charge and verdict sheets will also be submitted with the JPTO. As such, we are respectfully requesting an extension of time of 45 days to prepare and file the above submissions.

This is the fifth request for an extension of discovery deadlines and the four prior requests were granted. The parties thank the Court for its consideration of this request.

Respectfully submitted,

DAVIS & FERBER, LLP

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